

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

TUBAL-CAIN GAS FREE SERVICES, INC.	§	
	§	
V.	§	
	§	
B. NO. 242 CORP. and BOUCHARD	§	C.A. NO. 1:17-CV-00515
TRANSPORTATION CO., INC., <i>in</i>	§	
<i>personam</i> , and BARGE B. NO. 242, her	§	
engines, freights, apparel, appurtenances,	§	
tackle, etc., <i>in rem</i>	§	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION TO EXTEND MOTION CUT-OFF DEADLINE**

TO THE HONORABLE DISTRICT COURT:

COME NOW Defendants Bouchard Transportation Co., Inc. and B. No. 242 Corp. ("Bouchard"), and file this Response to Plaintiff's Motion to Extend Motion Cut-Off Deadline (Doc. 39) as follows:

I.

On the last date to file motions, Plaintiff filed a motion to extend that deadline for sixty (60) days, generally stating that it wants to conduct more discovery (but without identifying it)¹ and that it may want to file one or more motions, again unspecified.

II.

In the absence of any particulars, one cannot determine whether there is any good cause for motions not to have been filed by the current deadline. In communications about opposition to the motion, Defendants' counsel specifically asked what motions were contemplated, and Plaintiff's counsel refused to identify any. *See* Doc. 39, Ex. 1, p. 1

¹ Plaintiff states that within its Motion to Compel (Doc. 36) it asked for an extension of the May 21, 2018 discovery deadline. Defendants submit that there has been no actual motion to extend that deadline.

III.

WHEREFORE, Bouchard respectfully prays that the Court deny the requested extension, and for any such other relief to which it is entitled at law, in equity, or in admiralty.

Respectfully submitted,

CLARK HILL STRASBURGER

/s/ F. William Mahley

F. William Mahley

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all attorneys of record via the Court's e-filing system this 12th day of June, 2018.

/s/ F. William Mahley

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